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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	NO. 4:22-CR-00104-YGR
	)	
Plaintiff,	)	STIPULATION TO CONTINUE STATUS
	)	CONFERENCE AND TO EXCLUDE TIME FROM
v.	)	MAY 11, 2022 TO JUNE 22, 2022 AND
	)	[PROPOSED] ORDER
ENRIQUE CHAVEZ,	)	
	)	
Defendant.	)	

This matter is currently set for a status conference on May 11, 2022. To provide adequate time for the defense to review discovery already produced, for the government to obtain and produce additional discovery, and for the parties to engage in discussions regarding a potential resolution of this case, the parties hereby request that the status conference be continued to June 22, 2022.

The parties stipulate and agree that excluding time until June 22, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from May 11, 2022 through June 22, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

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Stip. to Continue Status Conference and Exclude Time and [Proposed] Order  
Case No. CR 22-104-YGR

1 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
2 counsel for the defendant to file this stipulation and proposed order.

3  
4 IT IS SO STIPULATED.

5 DATED: May 2, 2022

/s/ Andrew Paulson  
ANDREW PAULSON  
Assistant United States Attorney

7 DATED: May 2, 2022

/s/ Steven Kalar  
STEVEN KALAR  
Counsel for Defendant Enrique Chavez

9  
10 **[PROPOSED] ORDER**

11 The Court hereby continues the status conference in this matter to June 22, 2022 at 2:00 p.m.  
12 Additionally, based upon the facts set forth in the stipulation of the parties and the representations made  
13 to the Court, and for good cause shown, the Court finds that failing to exclude the time from May 11,  
14 2022 through June 22, 2022 would unreasonably deny defense counsel and the defendant the reasonable  
15 time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §  
16 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from  
17 May 11, 2022 through June 22, 2022 from computation under the Speedy Trial Act outweigh the best  
18 interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties,  
19 IT IS HEREBY ORDERED that the time from May 11, 2022 through June 22, 2022 shall be excluded  
20 from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

21 IT IS SO ORDERED.

22  
23 DATED: \_\_\_\_\_

HON. YVONNE GONZALEZ ROGERS  
United States District Judge